From: Miller, Garyg
To: Barth, Edwin

Cc: Sanchez, Carlos; Foster, Anne; Salinas, Amy

Subject: San Jacinto Feasibility Study

**Date:** Friday, November 22, 2013 8:58:31 AM

Ed.

Don't know if you have any experience with the issues below from the San Jacinto FS, but if you do have any comments on these statements I would appreciate your thoughts (such as significance of issues raised, accuracy, sheetpile use widespread? any EPA references that may clarify pros & cons of sheetpiles during remedial action; etc.). Sheetpiles are a part of several of the alternatives in the FS & would be used to reduce resuspension of sediments during excavation & removal of contaminated material.

Thanks,

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p. 41 of FS: "Further, case studies have shown that engineering controls used to control impacts from dredging such as sheetpiles may have limited effectiveness (Anchor

Environmental 2005; Anchor QEA and Arcadis 2010) and can pose unintended consequences, such as concentration of dissolved-phase chemicals, localized scour adjacent to

the barrier, and/or the spread of contaminants during their removal.

p. 57 of FS: "The use of a sheetpile barrier does little to enhance the short-term effectiveness of this

alternative because of documented effectiveness issues (Anchor Environmental 2005; Anchor QEA and Arcadis

2010; and USACE 2008) with engineered barriers, including:

- Incomplete isolation due to gaps in sheetpiles that may occur during installation
- The need to provide openings in the sheetpile to balance water pressures on both sides of the pile
- The potential for river-current-induced scour adjacent to the sheetpile.



In addition to these documented issues with sheetpile barriers, the use of sheetpiles increases the risk of

recontamination and resuspension of soil/sediments during sheetpile installation and removal (Ecology 1995), and potential cross-contamination associated with driving sheetpiling through impacted materials into non-impacted material."